REMARKS

Favorable reconsideration is requested in view of the above amendments and following remarks. Claims 16 and 25 have been canceled. Claims 15, 17, 22, and 23 have been amended. No new matter has been inserted. Claim 15 has been amended to include the limitations of original claim 16. The amendments to Claim 17 have support in the specification at least in the paragraph beginning on page 3, line 25. Claims 22 and 23 were amended to account for the amendment to claim 15 upon which they depend. Claims 15 and 17-24, and 26-35 are pending in this application.

Rejections under 35 U.S.C. § 112

Claim 16 was rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. The applicants respectfully traverse this rejection.

Claim 16 has been canceled and the limitations of that claim have been incorporated into claim 15. This amendment has eliminated any confusion as to the use of term adhesive film between the two claims rendering this rejection moot. The applicants respectfully request that this rejection be withdrawn.

Rejections under 35 U.S.C. § 103

Pitetti and Ishihara

Claim 15, 17-18, 22-25, 34-35 were rejected under 35 U.S.C. § 103(a) over Pitetti et al. (USPN 4,374,259) in view of Ishihara et al. (USPN 5,032,694). The applicants respectfully traverse this rejection.

While not conceding the correctness of the examiner's position, claim 15 has been amended to include the limitations of original claim 16, rendering this rejection moot. As claims 17-18, 22-25, and 34-35 are dependent on claim 15 the rejection as applied to them is also moot. The applicants respectfully request that this rejection be withdrawn.

Pitetti, Ishihara, and Kola

Claim 15 and 16 were rejected under 35 U.S.C. § 103(a) over Pitetti et al. (USPN 4,374,259) in view of Ishihara et al. (USPN 5,032,694) and Kola et al. (USPN 6,005,197). The applicants respectfully traverse this rejection.

Pitetti teaches the fabrication of film circuits. Ishihara discloses a flexible resin substrate. As acknowledged by the Examiner, Pitetti and Ishihara do not disclose that the second metal electrode is also in contact with the adhesive film. Kola does not overcome the deficiencies of Pitetti and Ishihara. Kola does not disclose a second metal electrode in contact with the metal oxide adhesive film. Kola only discloses a metal electrode with an extended portion 19 that is in contact directly with the *substrate* of a printed circuit board. Accordingly, the combination of Pitetti, Ishihara, and Kola does not teach or suggest having a metal oxide adhesive film that is in contact with both a first metal electrode film and a second metal electrode film.

Moreover, the reason stated by the Examiner for motivation to combine does not account for the elements of the invention as claimed. The Examiner states that one of skill in the art would extend the electrode over the substrate in order to allow for interconnection to the buried electrode. However, the Examiner fails to describe why one of skill in the art would be motivated to combine these references to obtain a flexible thin film capacitor wherein both the first and second metal electrode are directly in contact with a *metal oxide adhesive layer*. There

is no suggestion in any of the pieces of art cited by the Examiner to create this configuration. For the foregoing reasons the applicants respectfully request that this rejection be withdrawn.

Pitetti, Ishihara, and JP 08-78,283 A

Claim 15, 17-21 were rejected under 35 U.S.C. § 103(a) over Pitetti et al. (USPN 4,374,259) in view of Ishihara et al. (USPN 5,032,694) and JP 08-78,283 A. The applicants respectfully traverse this rejection.

While not conceding the correctness of the examiner's position, claim 15 has been amended to include the limitations of original claim 16, rendering this rejection moot. As claims 17-21 are dependent on claim 15 the rejection as applied to them is also moot. The applicants respectfully request that this rejection be withdrawn.

Pitetti, Ishihara, and Lebow

Claim 15, 17-18, 22-28, 30-35 were rejected under 35 U.S.C. § 103(a) over Pitetti et al. (USPN 4,374,259) in view of Ishihara et al. (USPN 5,032,694) and Lebow et al. (USPN 4,159,222). The applicants respectfully traverse this rejection.

While not conceding the correctness of the examiner's position, claim 15 has been amended to include the limitations of original claim 16, rendering this rejection moot. As claims 17-18, 22-28, and 30-35 are dependent on claim 15 the rejection as applied to them is also moot. The applicants respectfully request that this rejection be withdrawn.

In sum, the applicants believe that all of the pending claims are in condition for allowance and notification to that effect is respectfully requested.

If a telephone conference would be helpful in resolving any issues concerning this communication, please contact Applicants' primary attorney-of record, Douglas P. Mueller (Reg. No. 30,300), at (612) 371.5237.

Respectfully submitted,

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CBH:DPM:MED

VERSION WITH MARKINGS TO SHOW CHANGES MADE

Claims 16 and 25 were canceled.

Claims 15, 17, 22, and 23 were amended as follows:

15. (Amended) A method for producing a flexible thin film capacitor comprising:

forming a metal oxide adhesive film on a substrate formed of at least one selected from the group consisting of an organic polymer and a metal foil, and

forming a first metal electrode film, an inorganic high dielectric film and a second metal electrode film in this order on the metal oxide adhesive film [a substrate formed of at least one selected from the group consisting of an organic polymer and a metal foil], using respective masks;

wherein the first metal electrode film, [and] the inorganic high dielectric film and the second metal dielectric film are formed in contact with the metal oxide [an] adhesive film [on the substrate], thereby being integrated with the substrate by the metal oxide adhesive film.

17. (Amended) The method for producing a flexible thin film capacitor according to claim 15, wherein a metal [oxide] adhesive film is formed [as the adhesive film, and a metal adhesive film is formed] in a region where the first metal electrode film is to be formed on the metal oxide adhesive film.

22. (Amended) The method for producing a flexible thin film capacitor according to claim 15, wherein [a] the metal oxide adhesive film is formed [as the adhesive film] by at least

one method selected from the group consisting of RF magnetron sputtering, ECR magnetron sputtering, a vacuum evaporation method, a CVD method and a sol-gel process.

23. (Amended) The method for producing a flexible thin film capacitor according to claim 15, wherein [a] the metal oxide adhesive film is formed [as the adhesive film] by treating a metal film with a solution, and the metal film is formed by at least one method selected from the group consisting of DC magnetron sputtering, RF magnetron sputtering, ECR magnetron sputtering, a CVD method and a vacuum evaporation method.